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August 17, 2004

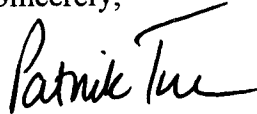
Public Service Commission of South Carolina
Attention: Docketing Department
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Sir:

Enclosed for filing are the original and 10 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for September 2004 and preliminary October 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with September data, and previews the changes BellSouth is considering making for October data. A Data Disclosure Report for August 2004 would be filed at this time as well, if needed; however, for August 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

Sincerely,



Patrick W. Turner

PWT/nml
Enclosure

cc: All Parties of Record
PC Docs # 547018

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SECTION 1

PROPOSED SEPTEMBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the September 2004 data month. Results for the September 2004 data month will be posted as follows:

Preliminary results October 20, 2004
Final results November 1, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O7 & O-11

Description of Change: Currently, a CLEC is allowed to send a new LSR without changing the company code, PON and version to replace an LSR that was fatally rejected. BellSouth is using the date and time of the receipt of the fatal reject to determine the report period of the LSR instead of the date and time of the receipt of the corrected LSR. In addition, in some cases Bellsouth is using the date and time of the receipt of the latest version of the LSR instead of the actual version being measured. BellSouth proposes to correct this problem by utilizing the last date and time received for each version of the LSR for these measures. This proposed change was Item (1) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5467)

Impact of Change: For May 2004 data, the O-11 Partial-Mechanized denominator would decrease by 3 records and the result would increase by .01%. Fully Mechanized results would increase by .11% with a decrease of 10 records from the denominator. For manual results, a total of 52 records would be removed from the denominator, which would cause a .95% increase in the result.

Provisioning Measurements

- (2) *Affected Measures:* P-1 (Florida only)

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Description of Change: Currently, CLEC data for EELs are not being reported in the Florida Held Order Interval Report because the code is not designed to identify Florida orders for this sub-metric. BellSouth proposes to correct this problem. This proposed change was Item (2) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5317)

Impact of Change: For March 2004, there were 6 held orders for EELs averaging 9.6 days.

- (3) *Affected Measures:* P-5 (All States)
P-2A (Florida, Georgia, Kentucky, and Tennessee)
P-2B (Florida, Georgia, Kentucky, South Carolina, and Tennessee)
P-2 & P-10 (Alabama, Louisiana, Mississippi, North Carolina, and South Carolina)
P-8 (Louisiana)
P-9 (North Carolina)

Description of Change: Currently, conversion orders associated with denial and restoral activities that are created to permit a CLEC to acquire a customer whose service has been denied by BellSouth are being counted as Non-Mechanized orders. BellSouth proposes to classify the orders as Mechanized when they result from a mechanized LSR. This proposed change was Item (3) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5419)

Impact of Change: For April 2004, ACNI in Tennessee for UNE-P would increase from 95.94% to 95.96%. For Non-Mechanized, UNE-P would decrease from 26% to 22.9%

- (4) *Affected Measures:* P-11 (Florida, Georgia, Kentucky, and Tennessee)

Description of Change: Currently, the data used to calculate the mechanized SOA only includes orders where both provisioning completion and final completion through billing occur in the same month. This measure should include all orders where provisioning is completed in the reporting period regardless of when final completion through billing occurs. BellSouth proposes to correct this problem. This proposed change was Item (4) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5430)

Impact of Change: For April 2004, the regional UNE results would change from 96.32% to 96.78%. For the same period, Resale would change from 96.22% to 98.91% and UNE-P would change from 96.44% to 96.22%.

- (5) *Affected Measures:* P-13B

Description of Change: Currently, when an LSR generates multiple trigger orders, PMAP assigns the date that the last trigger order was completed as the completion date for all telephone numbers on the LSR. BellSouth proposes to use the date that each trigger order was completed as the completion date for all telephone numbers on that order. This proposed change was Item (5) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5431)

Impact of Change: BellSouth's performance was understated by approximately 1.5%.

Billing Measurements

- (6) *Affected Measures:* B-10 (Florida, Georgia, Kentucky, North Carolina, and Tennessee)

Description of Change: The Billing Disputes and Adjustments Tracking System (BDATS) recently began assigning a negative sign to the value of a few adjustments. These appear to be corrupt records to PMAP so they are not reflected in the data. The records are valid and should not have the negative sign. The source system has been corrected, but as a precaution BellSouth proposes to change the PMAP code to capture such records should this condition reoccur. This proposed change was Item (6) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5387)

Impact of Change: For April 2004, in Florida, three of 792 (0.11%) records from BDATS reflected negative adjustment amounts.

Collocation Measurements

- (7) *Affected Measures:* C-2 (Florida and Tennessee only)

Description of Change: BellSouth proposes to correct the benchmark for C-2 – Virtual Augment – Without Additional Space from 45 Calendar Days to 60 Calendar Days as required by the SQM. This proposed change was Item (7) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5330)

Impact of Change: For May 2004, the reported Virtual Augment would have been within the benchmark.

- (8) *Affected Measures:* C-3 (Florida and Tennessee only)

Description of Change: BellSouth proposes to change from 2 levels of disaggregation to 6 levels of disaggregation consistent with the SQM. This proposed change was Item (8) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5331)

Impact of Change: For May 2004, there would be no change to the overall results as there were no missed due dates.

Special Access Measurements

- (9) *Affected Measures:* SA-2 (Florida and Georgia only)

Description of Change: Currently, BSLD data is not displayed on the Aggregate Reports. BellSouth proposed to display the BSLD column for Florida and Georgia. This proposed change was Item (9) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5335)

Impact of Change: None.

- (10) *Affected Measures:* SA-3 (Tennessee only)

Description of Change: Currently, the Tennessee Aggregate Special Access Offered vs. Requested Due Date - Distribution report is not being populated. BellSouth proposes to display the data for the Tennessee Aggregate Special Access Offered vs. Requested Due Date - Distribution report as required by the SQM. This proposed change was Item (10) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5399)

Impact of Change: None.

- (11) *Affected Measures:* SA-1 (Florida, Georgia, and Tennessee)

Description of Change: Currently, the percentage reported does not reflect FOCs sent on the same day that the ASR was received. Consistent with the SQM, these FOCs should be included and BellSouth proposes to correct the report. This proposed change was Item (11) on the Preliminary September Data Notification filed on July 1, 2004. (RQ5492)

Impact of Change: For April 2004, in Georgia, the 12-Month results would change from 81.28% to 96.21%.

PRELIMINARY OCTOBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the October 2004 data month. Results for the October 2004 data month will be posted as follows:

Preliminary results	November 22, 2004
Final results	November 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-7, O-8, O-9 & O-11

Description of Change: Currently, when a non-mechanized LSR is received with an inbound timestamp in eastern time and the outbound timestamp is in central time, PMAP is miscounting the duration as either a negative duration or a duration that is one hour less than the actual duration. BellSouth proposes to update PMAP code to normalize all inbound timestamps to central time. (RQ5601)

Impact of Change: For May 2004, in Georgia, for O-11, 2 of 5801 (0.03%) non-mechanized LSRs with a negative interval were reported as misses. For O-9, 3 of 3510 (0.09%) non-mechanized LSRs were reported as met but should have been reported as misses.

Provisioning Measurements

- (2) *Affected Measures:* P-11 (Florida, Georgia, North Carolina, and Tennessee)

Description of Change: Currently, BellSouth is incorrectly omitting UNE ISDN PRI Ports from this measure. BellSouth proposes to correct this problem by adding the UNE ISDN PRI Port product to the UNE disaggregation. (RQ5333)

Impact of Change: No orders were received from January 2004 - May 2004 data therefore, no records exist.

- (3) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee)

Description of Change: Currently, BellSouth is excluding CLEC initiated denial and restoral orders from the Mechanized SOA measure. BellSouth proposes to include these orders in the measure. (RQ5499)

Impact of Change: For April 2004, the regional result for the UNE-P disaggregation would change from 97.51% to 97.53%, (.02%). For the same month, the result for Resale would change from 96.29% to 96.37% (.08%).

- (4) *Affected Measures:* P-13, P-13B, P-13C & P-13D

Description of Change: Currently, BellSouth is manually loading data for the LNP measures into the warehouse. With the implementation of a recent Encore Release, the data can now be produced via mechanization. BellSouth proposes to migrate the LNP measures into the warehouse and produce them mechanically. (RQ5533)

Impact of Change: None.

- (5) *Affected Measures:* P-1, P-2B/P-2, P-3, P-4A/P-4, P-4B (Georgia), P-5, & P-9

Description of Change: Currently, some official BellSouth orders are being reported as part of the Retail Design Analog, when they should actually be excluded from these measures. BellSouth proposes to modify the code to exclude these official BellSouth orders consistent with the SQM. (RQ5560)

Impact of Change: For May 2004, in Georgia PMIA, the Retail Design result would increase by 0.13% and the Residence Business Design would increase by .01%.

- (6) *Affected Measures:* P-6B (Louisiana only)

Description of Change: Currently, the MSA level reports for this measure are reporting the data for Local Number Portability (LNP) in all disaggregations shown. PMAP is also generating extra disaggregations including INP Standalone, LNP Standalone and No Number Portability. BellSouth proposes to discontinue these extra disaggregations and the repetition of data. (RQ5592)

Impact of Change: None.

M&R Measurements

(7) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth includes the circuit identifier for the SLC (pair gain) digital pipe, in the line count for retail DS1 service. These circuit identifiers represent BellSouth internal circuits, which should be excluded from the retail line count. For clarification, the individual services riding within the SLC digital pipe are being properly assigned to the appropriate line count. BellSouth proposes to exclude these internal records consistent with the SQM. (RQ5435)

Impact of Change: For March 2004, the DS1 retail analog Customer Trouble Report Rate will be increased by the following percentages:

State	% Increase
Louisiana	0.02%
Mississippi	0.02%
Kentucky	0.01%
North Carolina	0.01%
Alabama	0.01%
South Carolina	0.00%
Florida	0.00%
Georgia	0.00%
Tennessee	0.01%

(8) *Affected Measures:* MR-2

Description of Change: Currently, BellSouth includes some records that are psuedo circuits used for billing purposes only. BellSouth proposes to exclude such records consistent with the SQM. (RQ5517)

Impact of Change: For March 2004, Georgia Design Bellsouth CTRR would increase from .025% to .026% and Georgia BellSouth Business, Residence and Design CTRR will increase from 1.55% to 1.56%.

Billing Measurements

(9) *Affected Measures:* B-10 (Florida and Tennessee only)

Description of Change: Currently, escalated Billing Adjustment Requests (BARs) are not included in the calculation of this measure. BellSouth proposes to include the interval from the receipt to the point of escalation as the interval for these records and to include these items in the calculation of the measure. (RQ5358)

Impact of Change: For June 2004, 3002 of 51,218 (5.86%) total Billing Adjustment Requests (BARs) received were in escalated status.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed September 2004 Data Notification Report and Preliminary October 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this August 17, 2004:

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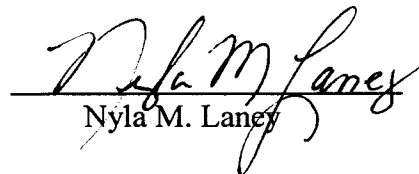
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